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April 5, 2023

VIA ELECTRONIC-FILING

The Honorable Christopher J. Burke
U.S. District Court for the District of Delaware
J. Caleb Boggs Federal Building
844 N. King Street
Wilmington, DE 19801-3556

Re: *The Nielsen Company (US), LLC v. HyphaMetrics, Inc.*,
C.A. No. 21-1591-CJB (D. Del.)

Dear Judge Burke:

The parties in the above-referenced matter write to request the scheduling of a discovery teleconference.

The following attorneys, including at least one Delaware Counsel and at least one Lead Counsel per party, participated in a verbal meet-and-confer by videoconference on March 31, 2023:

Plaintiff The Nielsen Company (US), LLC

Delaware Counsel: Bindu Palapura, Andy Brown

Lead Counsel: Steven Yovits, Constantine Koutsoubas, Melvin Gaddy

Defendant HyphaMetrics, Inc.

Delaware Counsel: Stacey Scrivani

Lead Counsel: Mark Anania

The disputes requiring judicial attention are listed below:

- (1) Whether Defendant must produce the experimental reports that it previously produced to Plaintiff and then clawed back as work product; and
- (2) Whether Defendant must also produce all other factual and non-opinion documents concerning the same subject matter, including the documents listed on Defendant's privilege log.

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We appreciate the Court's attention to this matter.

Respectfully,

/s/ Stacey Scrivani

Stacey Scrivani

/s/ David E. Moore

David E. Moore

DEM:nmt/10728432/14944.00003

cc: Clerk of the Court (via hand delivery)
Counsel of Record (via electronic mail)